Jeff Barber
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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

SAM ALLEN,)
Plaintiff,)
V.)
CORNELIUS AARON PETTUS, JR.,)
DEORMAN LEVI STOUT, and MUNICIPALITY OF ANCHORAGE,)
Defendants,) Case No. 3:21-cv-00136-JMK
)

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT AND RULE OF LAW REGARDING VICARIOUS LIABILITY AND AIDED-IN-AGENCY

COMES NOW the plaintiff, by and through counsel, and moves for partial summary judgment and for rule of law that the Municipality is vicariously liable for any harm to Mr. Allen in this case alleged to have been caused by its police officers under both *respondeat superior* and the aided in agency doctrine. F.R.C.P. 56 (c). Plaintiff's Memorandum in Support of Motion for Partial Summary Judgment and Rule of Law Regarding Vicarious Liability and Aided in Agency is filed herewith, along with his

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proposed Order.

DATED in Anchorage, Alaska this 26th day of August, 2021.

BARBER & ASSOCIATES, LLC Attorneys for Plaintiff

By:/s/Jeff Barber JEFF BARBER AK Bar #0111058

CERTIFICATE OF SERVICE

hereby certify that on this $\underline{26^{th}}$ of August, 2021, a copy of the foregoing was served by email to the following:

Pamela D. Weiss
pamela.weiss@anchorageak.gov
Clinton M. Campion
campion@alaskalaw.pro

/s/Angie Miller
Angie Miller

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